Order Type:

Findings Agreed Order

Findings Order Justification:

People or environmental receptors have been exposed to pollutants which exceed levels that are protective.

Media:

MWD

Small Business:

No

Location(s) Where Violation(s) Occurred:

City of Broaddus WWTF, located at the end of Sheffield Street, approximately 0.7 mile southwest of the intersection of County Road 361 and Shippy Road, approximately 300 feet west of State Highway 147, adjacent to Caney Creek, San Augustine County

Type of Operation:

Wastewater treatment facility

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: November 8, 2013

Comments Received: No

Penalty Information

Total Penalty Assessed: \$19,925

Amount Deferred for Expedited Settlement: \$0

Amount Deferred for Financial Inability to Pay: \$0

Total Paid to General Revenue: \$570 Total Due to General Revenue: \$19,355

Payment Plan: 35 payments of \$553 each

SEP Conditional Offset: \$0

Name of SEP: N/A

Compliance History Classifications:

Person/CN - Satisfactory Site/RN - Satisfactory

Major Source: No

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: September 2011

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: August 6, 2012

Date(s) of NOE(s): October 5, 2012

Violation Information

- 1. Failed to ensure that all systems of collection, treatment, and disposal are properly operated and maintained [Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0011772001, Operational Requirements No. 1, and 30 Tex. Admin. Code § 305.125(1) and (5)].
- 2. Failed to prevent the discharge of sludge from the Facility into or adjacent to water in the state [TPDES Permit No. WQ0011772001, Effluent Limitations and Monitoring Requirements Nos. 2 and 6 and Permit Conditions No. 2.d., 30 Tex. ADMIN. CODE § 305.125(1), and Tex. Water Code § 26.121(a)].
- 3. Failed to submit accurate monitoring results at the intervals specified in the permit [TPDES Permit No. WQ0011772001, Monitoring and Reporting Requirements No. 1 and 30 Tex. Admin. Code §§ 305.125(1) and 319.4].
- 4. Failed to collect effluent samples at the frequency specified in the permit [TPDES Permit No. WQ0011772001, Effluent Limitations and Monitoring Requirements No. 1 and 30 Tex. ADMIN. CODE §§ 305.125(1) and 319.4].
- 5. Failed to submit the annual sludge report to the TCEQ Beaumont Regional Office by September 30 of each year [TPDES Permit No. WQ0011772001, Sludge Provisions and 30 Tex. Admin. Code § 305.125(17)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

Respondent has implemented the following corrective measures:

- a. By August 9, 2012, installed a vacuum breaker at the hose bib outside the chlorination room;
- b. By August 10, 2012, replaced the grating for the bar screen;
- c. By August 13, 2012, provided the electrical disconnect box serving lift station no. 2 with an intruder resistant fence;

d. By August 16, 2012:

- i. Removed all solids from the chlorine contact chamber by pumping them back into the wet well and washed out the chlorine contact chamber;
- ii. Began collecting Escherichia coli samples at the frequency specified in the permit; and
- iii. Properly removed and disposed of all accumulations of sludge in the receiving stream.
- e. By August 22, 2012:
- i. Adjusted the chlorinator and returned to compliance with permitted chlorine residual and dissolved oxygen ("DO") levels; and
- ii. Removed all solids from treatment trains nos. 1 and 2 and returned operations at the Facility within the recommended ranges.
- f. By October 12, 2012, installed a new pump at lift station no. 2;
- g. By October 16, 2012:
- i. Updated the Facility's operational guidance and conducted employee training to ensure that all reporting procedures are properly accomplished;
- ii. Submitted the sludge report for the reporting period ending July 31, 2011 to the TCEQ Beaumont Regional Office; and
- iii. Submitted a revised discharge monitoring report for the monitoring period ending January 31, 2012 to include corrected data.

Technical Requirements:

The Order will require Respondent to:

a. Within 60 days, develop and implement a solids management plan ("SMP"). The SMP shall outline a program of internal process control testing to monitor the efficiency of the wastewater treatment plant and to maintain the proper solids balance within the system. The plan shall be prepared by a Texas registered professional engineer. At a minimum, the plan shall include the following items:

- i. A schedule for performing the following process control analysis and recommended ranges to be maintained: mixed liquor thirty-minute sludge settleability, mixed liquor suspended solids ("MLSS"), mixed liquor dissolved oxygen ("DO")concentration, clarifier sludge blanket depth, and residual chlorine concentration;
- ii. Procedures outlining actions to be taken in the event that any of the above process control analyses fall outside the recommended range; and
- iii. Specific sampling locations for the above stated process control measurements.

Organized, written records of the process control analyses shall be maintained for a period of three years at the Facility in a daily log book and shall be made available to TCEQ representatives upon request.

b. Within 75 days, submit written certification demonstrating that Respondent has begun operating the Facility within the recommended range for DO and MLSS to mixed liquor volatile suspended solids ratio in treatment trains nos. 1 and 2; and compliance with Ordering Provision a.

Litigation Information

Date Petition(s) Filed: N/A
Date Answer(s) Filed: N/A
SOAH Referral Date: N/A
Hearing Date(s): N/A
Settlement Date: N/A

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Jorge Ibarra, P.E., Enforcement Division, Enforcement Team 3, MC R-04, (817) 588-5890; Candy Garrett, Enforcement Division, MC 219, (512) 239-1456

TCEQ SEP Coordinator: N/A

Respondent: The Honorable Shirley J. Parker, Mayor, City of Broaddus, P.O. Box 149,

Broaddus, Texas 75929

Respondent's Attorney: N/A

Penalty Calculation Worksheet (PCW) PCW Revision August 3, 2011 Policy Revision 3 (September 2011) Assigned 8-Oct-2012 Screening 8-Oct-2012 PCW 10-Oct-2012 **EPA Due** RESPONDENT/FACILITY INFORMATION Respondent City of Broaddus Reg. Ent. Ref. No. RN101720928 Facility/Site Region 10-Beaumont Major/Minor Source Minor CASE INFORMATION Enf./Case ID No. 45160 No. of Violations 7 Docket No. 2012-2022-MWD-E Order Type Findings Government/Non-Profit Yes Media Program(s) Water Quality Enf. Coordinator Jorge Ibarra, P.E. Multi-Media EC's Team Enforcement Team 3 Maximum \$25,000 Admin. Penalty \$ Limit Minimum Penalty Calculation Section TOTAL BASE PENALTY (Sum of violation base penalties) \$19,250 Subtotal 1 ADJUSTMENTS (+/-) TO SUBTOTAL 1 Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage. **Compliance History** Subtotals 2, 3, & 7 \$3,850 20.0% Enhancement Enhancement for one agreed order with denial of liability. Notes Subtotal 4 \$0 Culpability No 0.0% Enhancement The Respondent does not meet the culpability criteria. Notes \$3,175 **Good Faith Effort to Comply Total Adjustments** Subtotal 5 \$0 **Economic Benefit** Subtotal 6 0.0% Enhancement* Total EB Amounts Capped at the Total EB \$ Amount \$7,690 Approx. Cost of Compliance **SUM OF SUBTOTALS 1-7** Final Subtotal \$19,925 OTHER FACTORS AS JUSTICE MAY REQUIRE 0.0% Adjustment \$0 Reduces or enhances the Final Subtotal by the indicated percentage. Notes Final Penalty Amount \$19,925

Final Assessed Penalty

Adjustment

0.0%

\$19,925

\$19,925

\$0

STATUTORY LIMIT ADJUSTMENT

Notes

PAYABLE PENALTY

Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

No deferral is recommended for Findings Orders.

DEFERRAL

Docket No. 2012-2022-MWD-E

Screening Date 8-Oct-2012

Respondent City of Broaddus

Case ID No. 45160

Reg. Ent. Reference No. RN101720928 Media [Statute] Water Quality Enf. Coordinator Jorge Ibarra, P.E. Policy Revision 3 (September 2011) PCW Revision August 3, 2011

	ry <i>Site</i> Enhancement (Subtotal 2) Number of	Enter Number Here	Adjust
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	0	0%
	Other written NOVs	0	0%
	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	1	20%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)		0%
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government		0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)		0%
Audio	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)		0%
	Ple	ease Enter Yes or No	
	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%
eat Violator (Adjustment Per	rcentage (Sub	total 2
No	**************************************	rcentage (Sub	total 3
ipliance Histo	ory Person Classification (Subtotal 7)		
Satisfac	ctory Adjustment Per	rcentage (Sub	total 7
opliance Histo	ory Summary		-
Compliance History Notes	Enhancement for one agreed order with denial of liability.		

Screening Date		Docket N	o. 2012-2022-MWD-E	PCW
Respondent Case ID No.	City of Broaddus			Policy Revision 3 (September 2011)
Reg. Ent. Reference No.				PCW Revision August 3, 2011
Media [Statute]				· ·
Enf. Coordinator Violation Number				
Rule Cite(s)		charge Elimination Sys	tem ("TPDES") Permit N	
Rule Cite(s)	WQ0011772001, Operat		. 1, and 30 Tex. Admin.	
Violation Description	chlorine contact chamber catch basin following the	d. Specifically, the elect cated within the fence is in lift station no. 2 wa led and corroding; then r and solids accumulation	rical disconnect box ser and the fence was not in as not operational; the g e were two feet of solid- ons were noted in the d eir; and a vacuum break	ving lift ntruder grating for s in the ischarge
· ·			Bas	e Penalty \$25,000
>> Environmental, Proper	tv and Human Healt	h Matrix		THE PROPERTY OF THE PROPERTY O
	Harm			The state of the s
OR Release		Minor	7	
Potential	X		Percent 5.0%	
>>Programmatic Matrix				
Falsification	Major Moderate	Minor		
	<u> </u>		Percent 0.0%	***************************************
Matriv II	lth or the environment will o not exceed levels that are pr a res			2-00-000-00-00-00-00-00-00-00-00-00-00-0
			Adjustment	\$23,750
			•	\$1,250
				\$1,230
Violation Events				
Number of	Violation Events 5	63	Number of violation	days
***************************************	daily			
	weekly			
mark only one	monthly		Violation Bas	e Penalty \$6,250
with an x	quarterly x semiannual		Violation Bas	e Penalty \$0,250
	annual			
Manufacture of the Control of the Co	single event			
Five quarter	y events are recommended, August 6, 2012 to the	one for each compone e screening date of Oct		n date of
Good Faith Efforts to Com	ply 10.0°	Reduction		\$625
	Before NOV Extraordinary	NOV to EDPRP/Settlemen	t Offer	
	Ordinary	×		TO TO THE TOTAL TOTAL TO THE TH
	N/A	(mark with x)		теринополог
	Notes The Resp	ondent achieved compl 2012 for this viol		-
		-	Violation	Subtotal \$5,625
Economic Benefit (EB) for	this violation		Statutory Limit	Test
	ed EB Amount	\$46	Violation Final Pen	
The second secon	This vi	olation Final Assesse	d Penalty (adjusted f	or limits) \$6,875
			, , ,	

	Ed	conomic I	Benefit	Wo	rksheet	40	
Respondent Case ID No.	45160						
teg. Ent. Reference No. Media Violation No.	Water Quality					Percent Interest	Years of Depreciation
	100000000000000000000000000000000000000					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$		and the second				
Delaved Costs			197				
Equipment				0.00	\$0	\$0	\$0
Buildings	Season are seen			0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction	State Assessed	April 10 10 10 10 10 10 10 10 10 10 10 10 10		0.00	\$0	\$0	\$0
Land	Salay Filteration (19	Davida da alguna dinger	e session fil	0.00	\$0	n/a	\$0
Record Keeping System	antangan pagengtingapit N			0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal	District Harrison			0.00	\$0	n/a	\$0
Permit Costs	CALCON BUILDING A BE			0.00	\$0	n/a	\$0
Other (as needed)	\$5,000	6-Aug-2012	12-Oct-2012	0.18	\$46	n/a	\$46
Notes for DELAYED costs	resistant fend chamber and	ce; to install a nev discharge catch b	v pump at lift stassin. Date req	tation ruired is of comp	no. 2; and to remo the investigation pliance.	g lift station no. 2 we solids from the codate, and the final codate.	hlorine contact date is the date
Avoided Costs	ANNUAL	IZE [1] avoided	costs before			for one-time avoi	
Disposal	#85,0850,080%, A500 A50			0.00		\$0	\$0 #0
Personnel	14 (1 0 1 4 1 4 1 4 1 4 1 4 1 4 1 4 1 4 1 4			0.00	\$0	\$0	\$0 #0
spection/Reporting/Sampling	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			0.00	\$0	\$0 \$0	\$0 \$0
Supplies/equipment		4		0.00	\$0		\$0 \$0
Financial Assurance [2]	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			0.00	\$0	\$0	
ONE-TIME avoided costs [3]				0.00		\$0	\$0 \$0
Other (as needed)				0.00	\$0	<u> \$0 </u>	50
Notes for AVOIDED costs							
	A STATE OF STATE O	NO SOLES POR LABOUR DE LA COMP	A state of the contract of the	1.14.1			

Screening Date	8-Oct-2012	Docket I	No. 2012-2022-MWD-E	PCW
	City of Broaddus			Policy Revision 3 (September 2011)
Case ID No.				PCW Revision August 3, 2011
Reg. Ent. Reference No. Media [Statute]				Acceptable
Enf. Coordinator				
Violation Number				
Rule Cite(s)	THE ROOM OF THE RESERVE	- W00044770004 FE		
		o. WQ0011772001, Effluer and 6 and Permit Conditior		
	11	.125(1), and Tex. Water C		

	H sandarian	discharge of sludge from the		
		d to meet permitted efflue stream at the outfall and		
Violation Description	of the outfall and a gr	rab sample documented th	at the chlorine residual m	aximum
		d the permitted limit. Addit		
	suntish and a stresse	d catfish were noted near sample results	いだいしゃ コンドン だいとうがい コードル かっしょ だいしょう	table for
		Sample results		
			Base	Penalty \$25,000
>> Environmental, Prope				
Release	Har Major Mode			
OR Actua				
Potentia		No. of Caraba Cara	Percent 30.0%	
>>Programmatic Matrix Falsification	Major Mode	rate Minor		
		esti ete esp	Percent 0.0%	
				1
Matrix Human healt Notes		as been exposed to polluta Iman health or environmer		that are
Notes				경기 경기 기계
				,
			Adjustment	\$17,500
3				\$7,500
Violation Events				
Number of	Violation Events 1	16	Number of violation	days
	4 1			
	daily <u>and and and and and and and and and and </u>			
	monthly x			
mark only one with an x	quarterly 2000		Violation Base	e Penalty \$7,500
mar an x	semiannual			
	annual single event			
	Shright Creme Landson			
One mor	othly event is recommer	nded from the investigation	date of August 6, 2012 to	n the
		lance date of August 22, 2		
Good Faith Efforts to Com		5.0% Reduction		\$1,875
	Before Extraordinary	NOV NOV to EDPRP/Settleme	nt Offer	
	Ordinary x			
	N/A	(mark with x)		
	The Pe	espondent achieved compli	ance by August 22, 2012	
	Notes The Re	spondent achieved compli- for this viola		
				Subtotal \$5,625
Economic Benefit (EB) for	this violation		Statutory Limit	
Estima	ted EB Amount	\$7	Violation Final Pena	alty Total \$7,125
	Th	nis violation Final Asses	sed Penalty (adjusted f	or limits) \$7,125

	E	conomic	Benefit	Wo	rksheet		
Respondent	,	us		****			
Case ID No.							
Reg. Ent. Reference No.	RN101720928						
Media	Water Quality					Percent Interest	Years of
Violation No.	2					i crecin interest	Depreciation
						5.0	15
	Ttem Cost	Date Required	Final Date	Vre	Interest Saved	Onetime Costs	EB Amount
The Description		Dute Required	,a. Dute	•••			
Item Description	No commas or \$						
Delayed Costs		4.4					
Equipment	24			0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction	ign in entrephic			0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	Avery Technologists	Mercial Chapt	region tip to a reasoning	0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal	\$3,000	6-Aug-2012	22-Aug-2012	0.04	\$7	n/a	\$7
Permit Costs	grantes and security	Albania Chiantian In	a agagagaga na amin'ny s	0.00	\$0	n/a	\$0
Other (as needed)		1		0.00	\$0	n/a	\$0
Notes for DELAYED costs	("DO") l	evels. Date requir	ed is the invest	igation	date, and the fina	rine residual and dis il date is the complia	nce date.
Avoided Costs	ANNUAL	TCE [1] avoided	costs before			for one-time avoid	
Disposal				0.00		\$0	\$0 #0
Personnel		 		0.00	\$0	\$0	\$0 \$0
Inspection/Reporting/Sampling		4		0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/equipment				0.00	\$0 \$0	\$0	\$0 \$0
Financial Assurance [2]			a Private Second	0.00		\$0	\$0 \$0
ONE-TIME avoided costs [3] Other (as needed)		-		0.00		\$0	\$0 \$0
Other (as needed)		,		<u> 11 0.00</u>	SERVED PURVEUS		STREET STREET
Notes for AVOIDED costs							
				15-1,5/9			
Approx. Cost of Compliance		\$3,000			TOTAL		\$7
							energi, segunda o o o o o o o o o o o o o o o o o o o

PCW on 3 (September 2011)	Docket No. 2012-2022-MWD-E Policy Revision	ning Date 8-Oct-2012 spondent City of Broaddus	
Revision August 3, 2011		se ID No. 45160 rence No. RN101720928 [Statute] Water Quality ordinator Jorge Ibarra, P.E. ion Number 3	Case Reg. Ent. Referer Media [S Enf. Coor
And delivery of the second sec	o. WQ0011772001, Monitoring and Reporting Requirements No. 1 nd 30 Tex. Admin. Code §§ 305.125(1) and 319.4	Rule Cite(s) TPDES Permit No	
	accurate monitoring results at the intervals specified in the permit. e discharge monitoring report ("DMR") for the monitoring period ry 31, 2012 had the values for dissolved oxygen ("DO") and pH reversed.	Specifically, the	Violation De
\$25,000	Base Penalty	<u> </u>	
***************************************	n Health Matrix Harm	tal, Property and Human	>> Environmental
Communication and the	Moderate Minor		OR
	Percent 0.0%	Actual Potential	UR
			>>Programmatic I
	Moderate Minor Percent 1.0%	Falsification Major Major	Fall
			Matrix
	an 70% of the rule requirement was met.	More th	Notes
	Adjustment \$24,750		
\$250]		, consideration of the state of
- Continue of the Continue of			Violation Events
	1 Number of violation days	Number of Violation Events	N
		daily	**************************************
		weekly monthly mark only one	ma.
\$250	Violation Base Penalty	with an x semiannual	
-	X	annual single event	one and the second seco
***************************************			The state of the s
despired with the second	One single event is recommended.		
\$25	10.0% Reduction	rts to Comply	Good Faith Efforts
	Before NOV NOV to EDPRP/Settlement Offer		
as each other property of the control of the contro	(mark with x)	Ordinary	AGENTALIS AND ASSESSED ASSESSE
Оорганизания	The Respondent achieved compliance by October 16,	N/A	TO A STATE OF THE
·	2012 for this violation.	Notes	
\$225	Violation Subtotal		es retain differencement
	Statutory Limit Test	it (EB) for this violation	Economic Benefit
\$275	\$3 Violation Final Penalty Total	Estimated EB Amount	To colonial formation of the colonial format
\$275	This violation Final Assessed Penalty (adjusted for limits)		

	E	conomic	Benefit	Wo	rksheet		100
Respondent Case ID No.	45160	us	-			TO THE STATE OF THE	
Reg. Ent. Reference No. Media Violation No.	Water Quality		•			Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs				-			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$250	6-Aug-2012	16-Oct-2012	0.19	\$2	n/a	\$2
Remediation/Disposal				0.00	\$0	n/a	\$0 \$0
Permit Costs Other (as needed)	\$25	20-Feb-2012	72.8	0.00	\$0 \$1	n/a n/a	\$0 \$1
Notes for DELAYED costs			equired are the	date th		erly prepare and sub nd the investigation	
Avoided Costs	ANNUAL	IZE [1] avoided	costs before	enteri	na item (except	for one-time avoi	ded costs)
Disposal				0.00	\$0	\$0	\$0
Personnel	TORK THE PARTY OF		Bardyaler ut.	0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling	15-1202-7 . (1-25-15.	3744K. s. vis (7).1		0.00	\$0	\$0	\$0
Supplies/equipment	10 State (#15)	735, 100 100		0.00	\$0	\$0	\$0
Financial Assurance [2]	aiskiosia er <u>s</u> agr	Levis Control	Area (C. Rec. M. Area)	0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]	3 1 1. ¹ 1			0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$275			TOTAL		\$3

PCW	Docket No. 2012-2022-MWD-E	8-Oct-2012		
	Policy Revision 3 (City of Broaddus		
ision August 3, 201	PCW Revisio		Case ID No.	
			ference No. ia [Statute]	
		Jorge Ibarra, P.E.		
			lation Number	
			Rule Cite(s)	71010
	No. WQ0011772001, Effluent Limitations and Monitoring	TPDES Permi		
	No. 1 and 30 Tex. Admin. Code §§ 305.125(1) and 319.4	Requirements		
	t effluent samples at the frequency specified in the permit. Ichia coli samples were not being collected monthly as required the permit for the months of May and June 2012.	Specifically, Escher	on Description	Violatio
\$25,00	Base Penalty			
		ty and Human I	ntal, Prope	Environme
	larm derate Minor		Dalassa	
	derate minor		Release Actua	t i
	x Percent 5.0%		Potentia	•
	double	14.	atic Matrix	rogramma
	derate Minor Percent 0.0%	Major Mo	Falsification	
	1 Cross	JL	L	
		Jeduna a zemania	Trakes Baris a	
	racteristics at the frequency specified in the permit will or could amounts of pollutants which would not exceed levels that are	onitor the effluent cha	Failure to mo	Matrix
	e of human health or the environment.		result in the	Notes
	Adjustment \$23,750			
	Adjustment \$23,750			
\$1,2				
			•	
			its	tion Even
	2 61 Number of violation days	Violation Events	Number of	
	lancer and the second s			
		daily		
		weekly		
#2 F		monthly	mark only one	
\$2,5	Violation Base Penalty	quarterly semiannual	with an x	
	- No. 17 min - 1 min			
		annual		
		annual single event		
	vents are recommended, one for each month.	annual single event		
	vents are recommended, one for each month.	annual single event		ę
\$6		annual single event Two quarterly e		
\$6	vents are recommended, one for each month. 25.0% Reduction Fore NOV NOV to EDPRP/Settlement Offer	annual single event Two quarterly e	forts to Con	d Faith Effe
\$6	25.0% Reduction	annual single event Two quarterly e	forts to Con	d Faith Eff
\$6	25.0% Reduction	annual single event Two quarterly e	forts to Con	d Faith Eff
\$6	25.0% Reduction fore NOV NOV to EDPRP/Settlement Offer	annual single event Two quarterly exply Extraordinary	forts to Con	d Faith Eff
\$6	25.0% Reduction Fore NOV NOV to EDPRP/Settlement Offer X	Two quarterly e	forts to Con	d Faith Eff
\$6	25.0% Reduction fore NOV NOV to EDPRP/Settlement Offer X	Two quarterly e	forts to Con	d Faith Eff
\$6	25.0% Reduction Fore NOV NOV to EDPRP/Settlement Offer X	Two quarterly e	forts to Con	l Faith Eff
\$6 \$1,8	25.0% Reduction fore NOV NOV to EDPRP/Settlement Offer X	Two quarterly e	forts to Con	d Faith Eff
	25.0% Reduction fore NOV NOV to EDPRP/Settlement Offer x (mark with x) Respondent achieved compliance by August 16, 2012 for this violation.	Two quarterly e		
	25.0% Reduction fore NOV NOV to EDPRP/Settlement Offer	Two quarterly e	efit (EB) fo	
\$1,8 \$2,3	25.0% Reduction fore NOV NOV to EDPRP/Settlement Offer X	Two quarterly explain the street of the stre	efit (EB) fo	
\$1,8	25.0% Reduction fore NOV NOV to EDPRP/Settlement Offer	Two quarterly explain the street of the stre	efit (EB) fo	

Violation No. Item Description Delayed Costs	RN101720928 Water Quality 4 Item Cost					Percent Interest	Years of
Media Violation No. Item Description Delayed Costs	Water Quality 4 Item Cost					Percent Interest	
Violation No. Item Description Delayed Costs	4 Item Cost	Date Required				Percent Interest	
Item Description Delayed Costs	Item Cost	Date Required				entral la propieta de la completa d	Depreciation
Delayed Costs		Date Required				5.0	15
Delayed Costs			Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Delayed Costs							
AND AND AND THE STREET OF A SECURITION OF A SE							
CONTRACTOR DATE OF THE PROPERTY OF THE PROPERT							
Equipment				0.00	\$0	\$0	\$0
Buildings	adio anticipio di		udi a buasan.	0.00	\$0	\$0	\$0
Other (as needed)		医抗性气管 第二		0.00	\$0	\$0	\$0
Engineering/construction		19. 14.2.2.3.3.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1		0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$200	6-Aug-2012	16-Aug-2012	0.03	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	datua, waxefi, tir A	ar garaga da a sar		0.00	\$0	n/a	\$0
Other (as needed)	e held han debeton og p	An educação de invalor	是现在是个CREEC 1809	0.00	\$0	l n/a l	\$0
	Estimated co	ost to begin collec	ting the require	d Esche		s at the frequency s	
Notes for DELAYED costs	permi	t. Date required is	the investigation	n date	erichia coli sample , and the final dat	s at the frequency s e is the date of com	pecified in the pliance.
Avoided Costs	permi	t. Date required is	the investigation	n date enterir	erichia coli sample , and the final dat ng item (except	s at the frequency s e is the date of com for one-time avoid	pecified in the pliance.
Avoided Costs Disposal	permi	t. Date required is	the investigation	on date enterir 0.00	erichia coli sample , and the final dat ng item (except \$0	s at the frequency s e is the date of com for one-time avoid \$0	pecified in the pliance.
Avoided Costs Disposal Personnel	permi	t. Date required is	the investigation	n date enterir	erichia coli sample , and the final dat ng item (except	s at the frequency s e is the date of com for one-time avoid	pecified in the pliance. led costs) \$0
Avoided Costs Disposal Personnel pection/Reporting/Sampling	permi	t. Date required is	the investigation	n date	erichía coli sample , and the final dat ng item (except \$0 \$0	s at the frequency s e is the date of com for one-time avoid \$0 \$0	pecified in the pliance. ied costs) \$0 \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment	permi	t. Date required is	the investigation	on date onterir 0.00 0.00 0.00 0.00	erichia coli sample , and the final dat ng item (except \$0 \$0 \$0	s at the frequency s e is the date of com for one-time avoid \$0 \$0	pecified in the pliance. ied costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling	permi	t. Date required is	the investigation	on date onterir 0.00 0.00 0.00	erichia coli sample: , and the final dat ng item (except \$0 \$0 \$0 \$0	s at the frequency s e is the date of com for one-time avoid \$0 \$0 \$0 \$0 \$0	pecified in the pliance. sled costs) \$0 \$0 \$0 \$0 \$0

PCW	Docket No. 2012-2022-MWD-E	Date 8-Oct-2012		
		ndent City of Broaddus		
sion August 3, 20	PCW Revision		Case ID No.	
		ce No. RN101720928		
	E	atute] Water Quality inator Jorge Ibarra, P.E.	ia [Statute]	mean
			lation Number	
	and the second of the second are the second of the second		Rule Cite(s)	VIOL
	t No. WQ0011772001, Operational Requirements No. 1 and 30 Tex.			
	Admin. Code § 305.125(1) and (5)			
	re that all systems of collection, treatment, and disposal are properly naintained. Specifically, the Repondent was bypassing the dual media ers and sending the effluent directly to the last treatment process.	cription operated and mainta	on Description	Violatio
\$25,0	Base Penalty			
	an Health Matrix	Property and Human H	ental, Proper	Environme
	Harm Moderate Minor		Release	
	10.5 (CARRIE D. C.) (CARRIE D. C.)	Actual		R
	Percent 5.0%		Potential	
	The state of the s			
				Programma
	Moderate Minor	fication Major Mod	Falsification	
	Percent 0.0%		\$400 WYAR MARLE	
	onment will or could be exposed to significant amounts of pollutants			Matrix
	s that are protective of human health or environmental receptors as a result of the violation.	would not exceed levels that	which would n	Notes
	Adjustment \$23,750			
	Adjustment \$25,750			
\$1,2				
			nts	ation Even
	Number of violation days	mber of Violation Events	Number of V	
		daily		
		weekly		
		monthly		
\$1,2	Violation Base Penalty	only one quarterly	mark only one with an x	
		semiannual	With the A	
		annual		
		single event		
		IN THE SAME PARTY OF A STREET STREET, THE STREET	Paragraphic and Savage	
	commended from the investigation date of August 6, 2012 to the		One quar	
	screening date of October 8, 2012.	scr		
		·		
	0.0% Reduction	o Comply	forts to Com	d Faith Eff
	Before NOV NOV to EDPRP/Settlement Offer	· · · · · · · · · · · · · · · · · · ·		
	8.2603.8604.8004.4603.6632.4604.7434.1	Extraordinary		
		Ordinary		
	(mark with x)	N/A		
	The Respondent does not meet the good faith criteria for	The		
	this violation.	Notes		
\$1,2	Violation Subtotal			
	on Statutory Limit Test	EB) for this violation	nefit (EB) for	nomic Ben
\$1,50	\$7,342 Violation Final Penalty Total	Estimated EB Amount	Fetimat	
		Saaayamay		
\$1,50	This violation Final Assessed Penalty (adjusted for limits)	•		-

	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	45160						
	Water Quality					Percent Interest	Years of Depreciation
Violation ito.	J					5.0	15
	Ttom Cost	Date Required	Final Date	Vre	Interact Saved	Onetime Costs	EB Amount
Item Description		**************************************	I mai Date	113	Interest Saved	Officialle Costs	LD AMOUNT
ttem bescription	NO commas or \$						And the second s
Delayed Costs							
Equipment				1 0.00	\$0	\$0	\$0
Buildings	1 1 1 1 1 1 1 1	1		0.00	\$0	\$0	\$0
Other (as needed)	A. Carlos Agrico	No. 8 (0.20) (0.20)		0.00	\$0	\$0	\$0
Engineering/construction		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	g that had the	0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	eres Serve 1974	434-412 343		0.00	\$0	n/a	\$0
Training/Sampling	menta di ati wa s		9 9 5 5	0.00	\$0	n/a	\$0
Remediation/Disposal	11 1 11 11 11 11 11 11 11 11 11 11 11 1			0.00	\$0	n/a	\$0
Permit Costs	ett in the			0.00	\$0	n/a	\$0
Other (as needed)	\$200,000	6-Aug-2012	1-May-2013	0.73	\$7,342	n/a	\$7,342
Notes for DELAYED costs Avoided Costs		and t	the final date is	the ex	pected date of con	required is the invention of the inventi	
Avoided Costs Disposal	AITHUAL	TEL [1] avoided	COSCS DEIOIE	0.00		\$0	\$0
Personnel				0.00		\$0	\$0
Inspection/Reporting/Sampling		Terre de la company	13 16 1 194	0.00	\$0	\$0	\$0
Supplies/equipment	- 21 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1 1 1 2 1	10.00 12.01.00.00.00		0.00	\$0	\$0	\$0
Financial Assurance [2]	125 27 80 38	er i de Arandige, e di aliandi.	a na destruitado	0.00		\$0	\$0
ONE-TIME avoided costs [3]	1.00		a sedenti i	0.00	\$0	\$0	\$0
Other (as needed)		and on your plant of days in		0.00		\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$200,000			TOTAL		\$7,342

Screening Date		Docket No. 2012-2022-MWD-E	PCW
Respondent Case ID No.	City of Broaddus		Policy Revision 3 (September 2011)
Reg. Ent. Reference No.			PCW Revision August 3, 2011
Media [Statute]			- Appropriate the second secon
Enf. Coordinator			
Violation Number			
Rule Cite(s)	TPDES Permit No.	WQ0011772001, Operational Requirements No. 1 and Admin. Code § 305.125(1) and (5)	30 Tex.
Violation Description	operated and main inventory indicated for mixed liquor su (MLVSS) ratio and	at all systems of collection, treatment, and disposal are stained. Specifically, an evaluation of the mixed liquor at that the Facility was operating outside the recommend ispended solids (MLSS) to mixed liquor volatile suspend DO in treatment train No. 1 and for 30-minute settleat centration, and MLSS to MLVSS ratio in treatment train	and solids led ranges ded solids bility (SV-
			e Penalty \$25,000
>> Environmental, Prope	200000000000000000000000000000000000000	Health Matrix Harm oderate Minor	manufacture of the control of the co
OR Actua		STATE OF THE STATE	
Potentia	1	x Percent 5.0%	
>>Programmatic Matrix Falsification	Major Mo	oderate Minor	
Talsincation	Major M	Percent 0.0%	
	olth or the environme	ent will or could be exposed to significant amounts of po	blutants
		t are protective of human health or environmental rece	
Notes		result of the violation.	
		Adjustment	\$23,750
			\$1,250
			\$1,230
Violation Events			
Number of	Violation Events	1 63 Number of violation	days
1	delli.		
	daily weekly	(ASSESSION)	
mark only one	monthly		
with an x	quarterly semiannual	Violation Bas	se Penalty \$1,250
**************************************	annual		
	single event		
		mended from the investigation date of August 6, 2012	to tho
One qua		creening date of October 8, 2012.	
Good Faith Efforts to Com		0.0% Reduction efore NOV NOV to EDPRP/Settlement Offer	\$0
- Andrews	Extraordinary		
	Ordinary		
· ·	N/A	X (mark with x)	1
	Notes	e Respondent does not meet the good faith criteria for this violation.	
- ·	L		Subtotal \$1,250
E			
Economic Benefit (EB) fo		Statutory Limi \$184 Violation Final Pen	
ESTIMA	ted EB Amount		-
		This violation Final Assessed Penalty (adjusted	for limits) \$1,500

1000	E	conomic	Benefit	Wo	rksheet		Andreas Company
Respondent Case ID No. Reg. Ent. Reference No.	City of Broadd 45160 RN101720928	lus					
Media Violation No.	Water Quality 6					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$	•					
Delaved Costs							
Equipment	- 1-1 / 1-1-1	I are a second		0.00	\$0	\$0	\$0
Buildings	The graduation	S44	. 1000	0.00	\$0	\$0	\$0
Other (as needed)	3			0.00	\$0	\$0	\$0
Engineering/construction	V 1. 1.2.11			0.00	\$0	\$0	\$0
Land		and Company of Co.		0.00	\$0	n/a	\$0
Record Keeping System	are de sa la sal			0.00	\$0	n/a	\$0
Training/Sampling	garounger electro	Name of the state of	y paren ja di	0.00	\$0	n/a	\$0
Remediation/Disposal	STATE FAREAGE SERVICE			0.00	\$0	n/a	\$0
Permit Costs			The Control of the Co	0.00	\$0	n/a	\$0
Other (as needed)	\$5,000	6-Aug-2012	1-May-2013	0.73	\$184	n/a	\$184
Notes for DELAYED costs	ratio in tre requ	atment trains nos lired is the investi	. 1 and 2 and to gation date, and	develong development developme	op and implement nal date is the exp	range for DO and M a solids management ected date of compl	nt plan. Date lance.
Avoided Costs	ANNUAL	.IZE [1] avoided	costs before			for one-time avoid	
Disposal	er i skrijasej		A SUPERATE SUPERATE SUPERATE	0.00	\$0	\$0	\$0
Personnel			The state of the s	0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling	. 1414 3 4 4 4 1 4 1 4 1			0.00	\$0	\$0	\$0
Supplies/equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0 \$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0 \$0	\$0	\$0 \$0
Other (as needed)				<u> 11 0.00</u>	30	,	30
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$5,000			TOTAL		\$184

Challed High State Commence of the Commence of	
Reg. Ent. Reference No. RN101720928 Media [Statute] Water Quality	vision 3 (September 2011) N Revision August 3, 2011
Media [Statute] Water Quality	N KEVISION AUGUST 3, 2011
Violation Number 7	
Pull Cita(a) Transaction with the control of the co	
TPDES Permit No. WQ0011772001, Sludge Provisions and 30 Tex. Admin. Code § 305.125(17)	
	_
Violation Description Failed to timely submit monitoring results at the intervals specified in the permit. Specifically, the Respondent failed to submit the annual sludge report for the reporting period ending July 31, 2011 to the TCEQ Beaumont Regional Office by September 30, 2011.	
Base Penal	ty \$25,000
	•
>> Environmental, Property and Human Health Matrix	
Harm Release Major Moderate Minor	
OR Actual Section 2 Sectio	
Potential Progressia Superioris Progress Percent 0.0%	
>>Programmatic Matrix	
Falsification Major Moderate Minor	
Percent 1.0%	
Matrix Constant than 70% of the Mile confirment was met	
Notes Greater than 70% of the rule requirement was met.	
Adjustment \$24,7	50]
	\$250
Rola New Tricks	
/iolation Events	
1 Number of violation days	
daily weekly	
monthly monthly	
mark only one with an x Violation Base Penal	ty \$250
semiannual was in the	
annual distribution in the second of the sec	
single event x	
	.
One single event is recommended.	<u> </u>
One single event is recommended.	
One single event is recommended.	
	\$25
Good Faith Efforts to Comply 10.0% Reduction Before NOV NOV to EDPRP/Settlement Offer	\$25
Good Faith Efforts to Comply Before NOV NOV to EDPRP/Settlement Offer Extraordinary	\$25
Good Faith Efforts to Comply 10.0% Reduction Before NOV NOV to EDPRP/Settlement Offer	\$25
Good Faith Efforts to Comply Before NOV NOV to EDPRP/Settlement Offer Extraordinary	\$25
Food Faith Efforts to Comply 10.0% Reduction Before NOV NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A	\$25
Good Faith Efforts to Comply Before NOV NOV to EDPRP/Settlement Offer Extraordinary Ordinary X	\$25
Good Faith Efforts to Comply 10.0% Reduction Before NOV NOV to EDPRP/Settlement Offer Extraordinary	\$25
Food Faith Efforts to Comply Before NOV NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A I(mark with x) The Respondent achieved compliance by October 16, 2012 for this violation.	
Food Faith Efforts to Comply 10.0% Reduction Before NOV NOV to EDPRP/Settlement Offer Extraordinary	
Good Faith Efforts to Comply 10.0% Reduction Before NOV NOV to EDPRP/Settlement Offer Extraordinary	
Good Faith Efforts to Comply 10.0% Reduction Before NOV NOV to EDPRP/Settlement Offer Extraordinary	
Good Faith Efforts to Comply 10.0% Reduction Before NOV NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A Notes The Respondent achieved compliance by October 16, 2012 for this violation. Violation Subtot Economic Benefit (EB) for this violation Statutory Limit Test	tal \$225

	E	conomic	Benefit	Wo	rksheet		
Respondent Case ID No.	45160						
Reg. Ent. Reference No. Media Violation No.	Water Quality					Percent Interest	Years of Depreciation
Violation No.	/					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description							
TO BERGE CONTROL OF THE STATE				Chromodol 2 transfer	******************************		
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings	Say New York 198			0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/construction				0.00	\$0	\$0	\$0
Land	PROBLEM STATES			0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0 \$0
Remediation/Disposal				0.00	\$0 \$0	n/a	\$0
Permit Costs Other (as needed)	\$50	30-Sep-2011	16 Oct 2012	1.05	\$3	n/a n/a	\$3
Notes for DELAYED costs	date the repo	ort was due and th	e final date is t	he date	e of compliance. Se) per report). Date ree Violation No. 3 for luct employee training	r the estimated
Avoided Costs	ANNUAL	IZE [1] avoided	costs before	enteri	ng item (except	for one-time avoid	led costs)
Disposal		Section 150 150		0.00	\$0	\$0	\$0
Personnel	ga nga tan sa i			0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling	Para de la casa de			0.00	\$0	\$0	\$0
Supplies/equipment	A SECTION OF SERVI	La Norma e di Aglacia di	Automorphics and	0.00		\$0	\$0
Financial Assurance [2]		4 (A) (1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1		0.00		\$0	\$0
ONE-TIME avoided costs [3]	P. M. Project Species			0.00		\$0	\$0
Other (as needed)		1		0.00	<u> \$0 </u>	L \$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$50			TOTAL		\$3

City of Broaddus RN101720928, Case No. 45160, TPDES Permit No. WQ0011772001 Docket No. 2012-2022-MWD-E

·	EFFLUENT PARAMETER					
,	Units/Permit Limit					
	Ammonia	Ortho- phosphorus	Total Phosphorous	TKN	Minimum DO	Cl Residual
Location	mg/L	mg/L	mg/L	mg/L	4 mg/L	1-4 mg/L
Outfall	5.32	2.12	1.73	6.68	2.8	> 8.0
75 feet Downstream	8.60	4.03	3.79	9.48	2.1	1.33
75 feet Upstream	1.85	0.07	0.15	4.40	np	np

milligrams per liter = mg/L; not performed = np total kjeldahl nitrogen = TKN; dissolved oxygen = DO; chlorine = Cl

To request a more accessible version of this report, please contact the TCEQ Help Desk at (512) 239-4357.



Compliance History Report

PENDING Compliance History Report for CN600738314, RN101720928, Rating Year 2012 which includes Compliance History (CH) components from September 1, 2007, through August 31, 2012.

Customer, Respondent,

or Owner/Operator:

CN600738314, City of Broaddus

Classification: SATISFACTORY

Rating: 8.25

Regulated Entity:

RN101720928, City of Broaddus

Classification: SATISFACTORY

Rating: 8.25

Complexity Points:

Repeat Violator: NO

CH Group:

08 - Sewage Treatment Facilities

Location:

Located at the end of Sheffield Street, approximately 0.7 mile southwest of the intersection of County Road 361 and Shippy Road, approximately 300 feet west of State Highway 147, adjacent to Caney Creek in San Augustine

County, Texas

TCEQ Region:

REGION 10 - BEAUMONT

ID Number(s):

WASTEWATER PERMIT WQ0011772001

WASTEWATER EPA ID TX0057673

WASTEWATER LICENSING LICENSE WQ0011772001

Compliance History Period: September 01, 2007 to August 31, 2012

Rating Year: 2012

Rating Date: 09/01/2012

Date Compliance History Report Prepared:

October 09, 2012

Agency Decision Requiring Compliance History:

Enforcement

Component Period Selected:

October 09, 2007 to October 09, 2012

TCEO Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Jorge Ibarra, P.E.

Phone (817) 588-5890

Site and Owner/Operator History:

1) Has the site been in existence and/or operation for the full five year compliance period?

YES NO

2) Has there been a (known) change in ownership/operator of the site during the compliance period?

3) If YES for #2, who is the current owner/operator?

N/A

4) If YES for #2, who was/were the prior

N/A

owner(s)/operator(s)?

5) If YES, when did the change(s) in owner or operator

N/A

occur?

Components (Multimedia) for the Site Are Listed in Sections A - J

Final Orders, court judgments, and consent decrees:

Effective Date: 05/18/2009

ADMINORDER 2007-0888-MLM-E (1660 Order)

Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(17)

Ramt Prov: SP III G PERMIT

Description: Failure to submit the Annual Sludge Reports by September 1.

Classification: Minor

Citation: 30 TAC Chapter 317 317.3(e)(4)(C)

Ramt Prov: OpR 1 PERMIT

Description: Failure to ensure that all systems of collection, treatment, and disposal are properly operated and maintained.

Classification: Minor

Citation: 30 TAC Chapter 330, SubChapter A 330.15(a)

Ramt Prov: SP PERMIT

Description: Failure to dispose of sludge at a TCEQ authorized land-application site or co-disposal landfill.

Classification: Minor

Citation: 30 TAC Chapter 317 317.6(b)(1)(D)

30 TAC Chapter 317 317.6(b)(1)(E)

Page 1

Rgmt Prov: OpR 1 PERMII

Description: Failure to properly maintain safety equipment for the gas chlorination facilities.

Classification: Minor

Citation: 30 TAC Chapter 317 317.7(b)

Rgmt Prov: Operational Requirements No. 1 PERMIT

Description: Failure to maintain an accessible stairway to the wastewater treatment plant.

Classification: Minor

Citation: 30 TAC Chapter 305, SubChapter F 305.125(5)

Rgmt Prov: OpR 1 PERMIT

Description: Failure to ensure that all systems of collection, treatment, and disposal are properly operated and maintained.

Classification: Minor

Citation: 30 TAC Chapter 319, SubChapter A 319.11(c)

30 TAC Chapter 319, SubChapter A 319.11(d)

Rgmt Prov: M&RR 2 PERMIT

Description: Failure to properly perform chlorine residual analysis.

Classification: Minor

Citation: 30 TAC Chapter 319, SubChapter A 319.11(a)

Rqmt Prov: M&RR 2 PERMIT

Description: Failure to properly prepare complete chain of custody (COC) records.

Classification: Minor

Citation: 30 TAC Chapter 305, SubChapter F 305.125(5)

Rqmt Prov: OpR 1 PERMIT

Description: Failure to ensure that all systems of collection, treatment, and disposal are properly operated and maintained.

Criminal convictions:

N/A

Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

Item 1	October 29, 2007	(622268)
Item 2	December 10, 2007	(622270)
Item 3	December 27, 2007	(622271)
Item 4	February 15, 2008	(674001)
Item 5	February 25, 2008	. (674000)
Item 6	April 09, 2008	(692274)
Item 7	April 28, 2008	(692275)
Item 8	June 02, 2008	(692276)
Item 9	July 07, 2008	(713374)
Item 10	July 28, 2008	(713375)
Item 11	October 03, 2008	(713376)
Item 12	October 23, 2008	(729449)
Item 13	November 14, 2008	(729451)
Item 14	December 29, 2008	(729452)
Item 15	January 28, 2009	(752670)
Item 16	March 04, 2009	(752668)
Item 17	March 18, 2009	(752669)
Item 18	April 17, 2009	(770330)
Item 19	May 18, 2009	(810567)
Item 20	June 15, 2009	(810568)
Item 21	July 30, 2009	(810569)
Item 22	September 28, 2009	(810571)
Item 23	October 26, 2009	(810572)
Item 24	November 23, 2009	(810573)
Item 25	March 15, 2010	(810566)
Item 26	March 26, 2010	(810570)
Item 27	April 22, 2010	(832925)

Pending Compliance History Report for CN600738314, RN101720928, Rating Year 2012 which includes Compliance History (CH) components from October 09, 2007, through October 09, 2012.

Item 28	May 24, 2010	(832926)
Item 29	July 06, 2010	(867643)
Item 30	August 02, 2010	(867644)
Item 31	August 30, 2010	(867645)
Item 32	September 30, 2010	(888670)
Item 33	November 09, 2010	(882196)
Item 34	December 21, 2010	(897027)
Item 35	January 27, 2011	(909817)
Item 36	February 11, 2011	(902942)
Item 37	February 22, 2011	(909816)
Item 38	March 23, 2011	(917056)
Item 39	May 02, 2011	(927212)
Item 40	May 19, 2011	(938746)
Item 41	June 27, 2011	(946119)
Item 42	August 02, 2011	(953380)
Item 43	August 19, 2011	(960017)
Item 44	September 28, 2011	(966067)
Item 45	November 02, 2011	(972093)
Item 46	November 30, 2011	(978254)
Item 47	December 28, 2011	(985057)
Item 48	January 23, 2012	(991332)
Item 49	March 05, 2012	(998693)
Item 50	March 23, 2012	(1004218)
Item 51	April 19, 2012	(1010781)
Item 52	June 04, 2012	(1017151)
Item 53	June 25, 2012	(1024935)
Item 54	August 03, 2012	(1032285)

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

N/A

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	8	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	TEXAS COMMISSION ON
CITY OF BROADDUS	§	
RN101720928	§	ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2012-2022-MWD-E

At its _____ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding the City of Broaddus ("Respondent") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent presented this agreement to the Commission.

The Respondent understands that it has certain procedural rights at certain points in the enforcement process, including, but not limited to, the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Agreed Order, the Respondent agrees to waive all notice and procedural rights.

It is further understood and agreed that this Order represents the complete and fully-integrated settlement of the parties. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable. The duties and responsibilities imposed by this Agreed Order are binding upon the Respondent.

The Commission makes the following Findings of Fact and Conclusions of Law:

I. FINDINGS OF FACT

1. The Respondent owns and operates a wastewater treatment facility located at the end of Sheffield Street, approximately 0.7 mile southwest of the intersection of County Road 361 and Shippy Road, approximately 300 feet west of State Highway 147, adjacent to Caney Creek in San Augustine County, Texas (the "Facility").

- 2. The Respondent has discharged municipal waste into or adjacent to any water in the state under TEX. WATER CODE ch. 26.
- 3. During an investigation conducted on August 6, 2012, TCEQ staff documented that the Respondent did not ensure that all systems of collection, treatment, and disposal are properly operated and maintained. Specifically, the electrical disconnect box serving lift station no. 2 was not located within the fence and the fence was not intruder resistant.
- 4. During an investigation conducted on August 6, 2012, TCEQ staff documented that the Respondent did not ensure that all systems of collection, treatment, and disposal are properly operated and maintained. Specifically, one of the pumps in lift station no. 2 was not operational.
- 5. During an investigation conducted on August 6, 2012, TCEQ staff documented that the Respondent did not ensure that all systems of collection, treatment, and disposal are properly operated and maintained. Specifically, the grating for the bar screen was rusted and corroding.
- 6. During an investigation conducted on August 6, 2012, TCEQ staff documented that the Respondent did not ensure that all systems of collection, treatment, and disposal are properly operated and maintained. Specifically, there were two feet of solids in the chlorine contact chamber and solids accumulations were noted in the discharge catch basin following the 60 degree V-notch weir.
- 7. During an investigation conducted on August 6, 2012, TCEQ staff documented that the Respondent did not ensure that all systems of collection, treatment, and disposal are properly operated and maintained. Specifically, a vacuum breaker was missing from the hose bib outside the chlorination room.
- 8. During an investigation conducted on August 6, 2012, TCEQ staff documented that the Respondent did not prevent the discharge of sludge from the Facility into or adjacent to water in the state and failed to meet permitted effluent limits. Specifically, sludge was noted in the receiving stream at the outfall and approximately 75 feet downstream of the outfall and a grab sample documented that the chlorine residual maximum concentration exceeded the permitted limit. Additionally, a dead bluegill fish, a dying sunfish and a stressed catfish were noted near the outfall as shown in the table below:

EFFLUENT PARAMETER						
	Units/Permit Limit					
	Ammonia	Ortho- phosphorus	Total Phosphorous	TKN	Minimum DO	Cl Residual
Location	mg/L	mg/L	mg/L	mg/L	4 mg/L	1-4 mg/L
Outfall	5.32	2.12	1.73	6.68	2.8	> 8.0
75 feet Downstream	8.60	4.03	3.79	9.48	2.1	1.33
75 feet Upstream	1.85	0.07	0.15	4.40	np	np

milligrams per liter = mg/L; not performed = np total kjeldahl nitrogen = TKN; dissolved oxygen = DO; chlorine = Cl

- 9. During an investigation conducted on August 6, 2012, TCEQ staff documented that the Respondent did not submit accurate monitoring results at the intervals specified in the permit. Specifically, the discharge monitoring report ("DMR") for the monitoring period ending January 31, 2012 had the values for DO and pH reversed.
- During an investigation conducted on August 6, 2012, TCEQ staff documented that the Respondent did not collect effluent samples at the frequency specified in the permit. Specifically, *Escherichia coli* samples were not being collected monthly as required by the permit for the months of May and June 2012.
- 11. During an investigation conducted on August 6, 2012, TCEQ staff documented that the Respondent did not ensure that all systems of collection, treatment, and disposal are properly operated and maintained. Specifically, the Repondent was bypassing the dual media gravity filters and sending the effluent directly to the last treatment process.
- 12. During an investigation conducted on August 6, 2012, TCEQ staff documented that the Respondent did not ensure that all systems of collection, treatment, and disposal are properly operated and maintained. Specifically, an evaluation of the mixed liquor and solids inventory indicated that the Facility was operating outside the recommended ranges for mixed liquor suspended solids (MLSS) to mixed liquor volatile suspended solids (MLVSS) ratio and DO in treatment train No. 1 and for 30-minute settleability (SV-30), MLVSS concentration, and MLSS to MLVSS ratio in treatment train No. 2.
- 13. During an investigation conducted on August 6, 2012, TCEQ staff documented that the Respondent did not timely submit monitoring results at the intervals specified in the permit. Specifically, the Respondent failed to submit the annual sludge report for the reporting period ending July 31, 2011 to the TCEQ Beaumont Regional Office by September 30, 2011.
- 14. The Respondent received notice of the violations on October 10, 2012.

- 15. The Executive Director recognizes that the Respondent has implemented the following corrective measures at the Facility:
 - a. By August 9, 2012, installed a vacuum breaker at the hose bib outside the chlorination room;
 - b. By August 10, 2012, replaced the grating for the bar screen;
 - c. By August 13, 2012, provided the electrical disconnect box serving lift station no. 2 with an intruder resistant fence;
 - d. By August 16, 2012:
 - i. Removed all solids from the chlorine contact chamber by pumping them back into the wet well and washed out the chlorine contact chamber;
 - ii. Began collecting Escherichia coli samples at the frequency specified in the permit; and
 - iii. Properly removed and disposed of all accumulations of sludge in the receiving stream.
 - e. By August 22, 2012:
 - i. Adjusted the chlorinator and returned to compliance with permitted Cl residual and DO levels; and
 - ii. Removed all solids from treatment trains nos. 1 and 2 and returned operations at the Facility within the recommended ranges.
 - f. By October 12, 2012, installed a new pump at lift station no. 2;
 - g. By October 16, 2012:
 - i. Updated the Facility's operational guidance and conducted employee training to ensure that all reporting procedures are properly accomplished;
 - ii. Submitted the sludge report for the reporting period ending July 31, 2011 to the TCEQ Beaumont Regional Office; and
 - iii. Submitted a revised DMR for the monitoring period ending January 31, 2012 to include corrected data.

II. CONCLUSIONS OF LAW

- 1. The Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. WATER CODE chs. 7 and 26 and the rules of the Commission.
- 2. As evidenced by Findings of Fact No. 3, the Respondent failed to ensure that all systems of collection, treatment, and disposal are properly operated and maintained, in violation of Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0011772001, Operational Requirements No. 1, and 30 Tex. Admin. Code § 305.125(1) and (5).
- 3. As evidenced by Findings of Fact No. 4, the Respondent failed to ensure that all systems of collection, treatment, and disposal are properly operated and maintained, in violation of TPDES Permit No. WQ0011772001, Operational Requirements No. 1, and 30 TEX. ADMIN. CODE § 305.125(1) and (5).
- 4. As evidenced by Findings of Fact No. 5, the Respondent failed to ensure that all systems of collection, treatment, and disposal are properly operated and maintained, in violation of TPDES Permit No. WQ0011772001, Operational Requirements No. 1, and 30 TEX. ADMIN. CODE § 305.125(1) and (5).
- 5. As evidenced by Findings of Fact No. 6, the Respondent failed to ensure that all systems of collection, treatment, and disposal are properly operated and maintained, in violation of TPDES Permit No. WQ0011772001, Operational Requirements No. 1, and 30 Tex. ADMIN. CODE § 305.125(1) and (5).
- 6. As evidenced by Findings of Fact No. 7, the Respondent failed to ensure that all systems of collection, treatment, and disposal are properly operated and maintained, in violation of TPDES Permit No. WQ0011772001, Operational Requirements No. 1, and 30 Tex. ADMIN. CODE § 305.125(1) and (5).
- 7. As evidenced by Findings of Fact No. 8, the Respondent failed to prevent the discharge of sludge from the Facility into or adjacent to water in the state, in violation of TPDES Permit No. WQ0011772001, Effluent Limitations and Monitoring Requirements Nos. 2 and 6 and Permit Conditions No. 2.d., 30 Tex. ADMIN. CODE § 305.125(1), and Tex. WATER CODE § 26.121(a).
- 8. As evidenced by Findings of Fact No. 9, the Respondent failed to submit accurate monitoring results at the intervals specified in the permit, in violation of TPDES Permit No. WQ0011772001, Monitoring and Reporting Requirements No. 1 and 30 Tex. ADMIN. CODE §§ 305.125(1) and 319.4.
- 9. As evidenced by Findings of Fact No. 10, the Respondent failed to collect effluent samples at the frequency specified in the permit, in violation of TPDES Permit No. WQ0011772001, Effluent Limitations and Monitoring Requirements No. 1 and 30 TEX. ADMIN. CODE §§ 305.125(1) and 319.4.

- As evidenced by Findings of Fact No. 11, the Respondent failed to ensure that all systems of collection, treatment, and disposal are properly operated and maintained, in violation of TPDES Permit No. WQ0011772001, Operational Requirements No. 1 and 30 Tex. ADMIN. CODE § 305.125(1) and (5).
- As evidenced by Findings of Fact No. 12, the Respondent failed to ensure that all systems of collection, treatment, and disposal are properly operated and maintained, in violation of TPDES Permit No. WQ0011772001, Operational Requirements No. 1 and 30 Tex. ADMIN. CODE § 305.125(1) and (5).
- As evidenced by Findings of Fact No. 13, the Respondent failed to submit the annual sludge report to the TCEQ Beaumont Regional Office by September 30 of each year, in violation of TPDES Permit No. WQ0011772001, Sludge Provisions and 30 Tex. ADMIN. CODE § 305.125(17).
- Pursuant to Tex. Water Code § 7.051, the Commission has the authority to assess an administrative penalty against the Respondent for violations of the Texas Water Code and the Texas Health and Safety Code within the Commission's jurisdiction; for violations of rules adopted under such statutes; or for violations of orders or permits issued under such statutes.
- An administrative penalty in the amount of Nineteen Thousand Nine Hundred Twenty-14. Five Dollars (\$19,925) is justified by the facts recited in this Agreed Order, and considered in light of the factors set forth in Tex. Water Code § 7.053. The Respondent has paid Five Hundred Seventy Dollars (\$570) of the administrative penalty. The remaining amount of Nineteen Thousand Three Hundred Fifty-Five Dollars (\$19,355) of the administrative penalty shall be payable in 35 monthly payments of Five Hundred Fifty-Three Dollars (\$553) each. The next monthly payment shall be paid within 30 days after the effective date of this Agreed Order. The subsequent payments shall each be paid not later than 30 days following the due date of the previous payment until paid in full. If the Respondent fails to timely and satisfactorily comply with the payment requirements of this Agreed Order, the Executive Director may, at the Executive Director's option, accelerate the maturity of the remaining installments, in which event the unpaid balance shall become immediately due and payable without demand or notice. In addition, the failure of the Respondent to meet the payment schedule of this Agreed Order constitutes the failure by the Respondent to timely and satisfactorily comply with all the terms of this Agreed Order.

III. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed an administrative penalty in the amount of Nineteen Thousand Nine Hundred Twenty-Five Dollars (\$19,925) as set forth in Section II,

Paragraph 14 above, for violations of TCEQ rules and state statutes. The payment of this administrative penalty and the Respondent's compliance with all the terms and conditions set forth in this Agreed Order completely resolve the violations set forth by this Agreed Order in this action. However, the Commission shall not be constrained in any manner from requiring corrective actions or penalties for other violations that are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: City of Broaddus, Docket No. 2012-2022-MWD-E" to:

Financial Administration Division, Revenue Operations Section Attention: Cashier's Office, MC 214 Texas Commission on Environmental Quality P.O. Box 13088 Austin, Texas 78711-3088

- 2. The Respondent shall undertake the following technical requirements:
 - a. Within 60 days after the effective date of this Agreed Order, develop and implement a solids management plan ("SMP"). The SMP shall outline a program of internal process control testing to monitor the efficiency of the wastewater treatment plant and to maintain the proper solids balance within the system. The plan shall be prepared by a Texas registered professional engineer. At a minimum, the plan shall include the following items:
 - i. A schedule for performing the following process control analysis and recommended ranges to be maintained: mixed liquor thirty-minute sludge settleability, MLSS, mixed liquor dissolved oxygen concentration, clarifier sludge blanket depth, and residual chlorine concentration;
 - ii. Procedures outlining actions to be taken in the event that any of the above process control analyses fall outside the recommended range; and
 - iii. Specific sampling locations for the above stated process control measurements.

Organized, written records of the process control analyses shall be maintained for a period of three years at the Facility in a daily log book and shall be made available to TCEQ representatives upon request.

b. Within 75 days after the effective date of this Agreed Order, submit written certification as described below, and include detailed supporting documentation to demonstrate that the Respondent has begun operating the Facility within the recommended range for DO and MLSS to MLVSS ratio in treatment trains nos. 1 and 2; and compliance with Ordering Provision No. 2.a. The certification shall be notarized by a State of Texas Notary Public and include the following certification language:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team Enforcement Division, MC 149A Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

with a copy to:

Water Section Manager Beaumont Regional Office Texas Commission on Environmental Quality 3870 Eastex Freeway Beaumont, Texas 77703-1892

- 3. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.
- 4. If the Respondent fails to comply with any of the Ordering Provisions in this Agreed Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Agreed Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
- 5. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not

City of Broaddus DOCKET NO. 2012-2022-MWD-E Page 9

effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.

- 6. The Executive Director may refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings without notice to the Respondent if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.
- 7. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
- 8. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- This Agreed Order may be executed in separate and multiple counterparts, which 9. together shall constitute a single instrument. Any page of this Agreed Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Agreed Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. paragraph exclusively, the terms "electronic transmission", "owner", "person", "writing", and "written" shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
- 10. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties. By law, the effective date of this Agreed Order is the third day after the mailing date, as provided by 30 Tex. Admin. Code § 70.10(b) and Tex. Gov't Code § 2001.142.

City of Broaddus DOCKET NO. 2012-2022-MWD-E Page 10

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	
Pann Monein 2	2/18/14
For the Executive Director	Date
Broaddus. I am authorized to agree to the attack	ne attached Agreed Order in the matter of City of hed Agreed Order on behalf of City of Broaddus, tions. I further acknowledge that the TCEQ, in aterially relying on such representation.
procedural rights, including, but not limited to, to by this Agreed Order, notice of an evidentiary to the right to appeal. I agree to the terms of the	reed Order, City of Broaddus waives certain the right to formal notice of violations addressed nearing, the right to an evidentiary hearing, and Agreed Order in lieu of an evidentiary hearing. Idication by the Commission of the violations set
 and/or failure to timely pay the penalty amount, A negative impact on compliance history Greater scrutiny of any permit applicatio Referral of this case to the Attorney of additional penalties, and/or attorney fees Increased penalties in any future enforce 	; ins submitted; General's Office for contempt, injunctive relief, s, or to a collection agency; ment actions; eral's Office of any future enforcement actions; by law.
Shirley & Parker Signature	Date 10/1/13
Shirley J Parker Name (Printed or typed) Authorized Representative of City of Broaddus	Title

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Section IIÌ, Paragraph 1 of this Agreed Order.